

The Honorable James L. Robart

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

AMAZON.COM, INC., a Delaware corporation,  
AMAZON.COM SERVICES LLC, a Delaware  
limited liability company, and AMAZON  
TECHNOLOGIES, INC., a Nevada corporation,

Plaintiffs,

v.

Does 1-20, unknown parties doing business as  
“REKK,” and the following individuals: Oscar  
Pineda, Janiyah Alford, Noah Page, Skylar  
Robinson, William Walsh, Luke Colvin,  
Alejandro Taveras, Andrew Ling, Brandon  
Sukhram, Charalampos Gkatzoulas, Cosmin  
Sopca, Dylan Hinz, Eric Niezabytowski, Graham  
Ferguson, Ivona Brazovskaja, James Garofalo,  
Jenny Tran, Johanes Kessel, Jorge Correa, Josh  
Davis, Karcper Niepogoda, Olaf Booij, Ryan  
Bates, Sai Charan Beeravelli, Simone Antonio  
Figura, Zachary Iguelmamene, and Zoha Ahmed,

Defendants.

No. 2:23-cv-01879-JLR

STIPULATED PERMANENT  
INJUNCTION AS TO  
DEFENDANT ZACHARY  
IGUELMAMENE AND  
~~PROPOSED~~ ORDER

NOTED FOR CONSIDERATION:  
February 15, 2024

*Without Oral Argument*

**STIPULATION**

Plaintiffs Amazon.com, Inc., Amazon.com Services LLC, and Amazon Technologies,  
Inc. (together, “Amazon”), and Defendant Zachary Iguelmamene (“Iguelmamene”) and  
(collectively “Settling Parties”), by and through Amazon’s respective counsel of record and by

1 Iguelmamene's pro-se representation, notify the Court that the Settling Parties have reached a  
2 settlement of all claims between them in this matter. Pursuant to the terms of that settlement, the  
3 Settling Parties stipulate and agree to entry of the permanent injunction below.

4 //

5 //

6 //

7 //

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

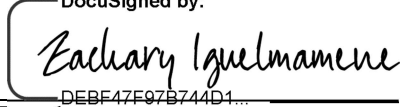
27

DATED this 15th day of February, 2024.

Davis Wright Tremaine LLP  
*Attorneys for Plaintiffs Amazon.com*

*Defendant*

By s/Bonnie MacNaughton  
Bonnie MacNaughton, WSBA #36110  
Tim Cunningham, WSBA #50224  
Melina Garcia, WSBA #58036  
920 Fifth Avenue, Suite 3300  
Seattle, WA 98104-1610  
Phone: 206-622-3150  
Fax: 206-757-7700  
Email: bonniemacnaughton@dwt.com  
timcunningham@dwt.com  
melinagarcia@dwt.com

DocuSigned by:  
  
By s/ Zachary Iguelmamene  
Zachary Iguelmamene  
Phone: 408-913-5640  
Email: zacharyiguelmamene@gmail.com

### **PERMANENT INJUNCTION**

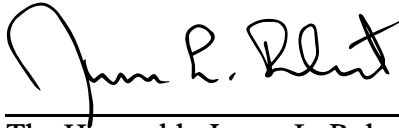
Pursuant to the above stipulation of the parties, IT IS HEREBY ORDERED that Defendant Zachary Iguelmamene, and his respective employees, agents, successors and assigns, and all others in active concert or participation with him, are permanently enjoined and restrained from:

1. Accessing and using, whether directly or indirectly via a third party, intermediary, or proxy, Amazon.com, or any other Amazon online store around the world.
2. Exploiting or abusing Amazon's ordering or return services;
3. Making false statements or misrepresentations to Amazon;
4. Engaging in any activity that defrauds Amazon into paying money or providing replacement products for illegitimate returns;
5. Engaging in any scheme or malicious activity that interacts with Amazon; and
6. Knowingly and materially assisting or engaging any other person or business entity in engaging in or performing any of the activities listed above.

1 The Court shall retain continuing jurisdiction over this matter for the limited purposes of  
2 enforcing the terms of the Settling Parties' settlement agreement and this Stipulated Permanent  
3 Injunction.

4 IT IS SO ORDERED.

5 DATED: February 15, 2024.

6  
7 

8 The Honorable James L. Robart  
9 UNITED STATES SENIOR DISTRICT JUDGE  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27